

### **REMARKS**

This responds to the Office Action dated on March 20, 2006, and the references cited therewith.

Claims 1, 7-11, 13, 17, 21, 25, 28, and 33 are amended; as a result, claims 1-46 are now pending in this application.

### **Claim Objections**

Claim 7 was objected to due to an informality. Applicant has corrected the informality as requested by the Examiner. Accordingly, this objection is no longer appropriate and should be withdrawn. Applicant respectfully requests an indication of the same.

### **§112 Rejection of the Claims**

Claims 25-27 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicant has corrected the ambiguity identified by the Examiner with respect to the external data source and the control and storage buffers. Specifically, the control buffer is the external data source, this is clear from FIG. 1 and the discussion of the Specification. Accordingly, the rejection with respect to this ambiguity is now resolved and should be withdrawn. Applicant respectfully requests an indication of the same.

### **§102 Rejection of the Claims**

Claims 1-5, 7-9, 13-18, 21, 23 and 25-27 were rejected under 35 U.S.C. § 102(e) as being anticipated by de la Iglesia et al. (U.S. Patent No. 6,490,703). It is of course fundamental that in order to sustain an anticipation rejection that each and every step or element in the rejected claims must be taught or suggested in the cited reference.

The Examiner has stated that Applicant's arguments in the prior response are not valid for at least two reasons. First the Examiner asserts that there is no discernable structure that is external to the claim. With respect to this argument, Applicant notes that the "data source" does not have to be external to the claim, it just has to be associated with a different "device." The

claim can include limitations associated with two different devices as this is regularly done. The limitations merely reflect structure and interaction between multiple devices that cooperate with one another. So, Applicant believes that the Examiner meant to say the data source was or could be arguably associated with a same device as previously drafted. Applicant has removed this as a viable interpretation of the independent claim language by clearly stating the “external data source device” and stating that it is a “different device” for the inversion.

This now clearly demonstrates that the claimed limitations are distinguishable over de la Iglesia because in de la Iglesia the data to be inverted is self contained within the same device. That is, the memory of de la Iglesia may arguably be external to the memory interface but it is not associated with a separate device that is different from the memory interface. Such a limitation is now positively recited in Applicant’s amended independent claims. Again, de la Iglesia provides a self contained integrated approach for a same device. It does not provide a teaching or suggestion where the inversion can be achieved via a cooperating and separate device that supplies the data to be inverted. It would appear that de la Iglesia would have to first transfer data from such a separate source device into its device and then perform its inversion. This is not what Applicant has claimed.

Therefore, Applicant respectfully asserts that the de la Iglesia reference fails to teach or suggest each and every limitation of the amended independent claims and the rejections with respect to de la Iglesia should be withdrawn.

Claims 1-37, 39-41 and 44-46 were rejected under 35 U.S.C. § 102(b) as being anticipated by Norman (U.S. Patent No. 5,873,112). Again, to sustain an anticipation rejection each and every step or element in the rejected claims must be taught or suggested in the cited reference.

The Examiner asserts that FIG. 7 clearly shows that Norman uses external sources, namely 401 and 416. However, FIG. 7 shows and describes nothing with respect to external source devices and the description of FIG. 7 in the specification actually indicates that FIG. 7 is to be interpreted in the same manner or juxtaposed with FIG. 3 and it states that the components are part of an integrated circuit. Thus, even assuming the FIG. 7 shows an external source it does not show an external device, such as now is recited in the independent claims.

Furthermore, the Norman specification states that the components are part of the same integrated circuit or device. Therefore, Applicant respectfully asserts that with the new amended claim language there is no teaching or suggestions of external source devices, which are different from the inverting device and which cooperate together in the manner recited in the amended claims. Thus, Applicant respectfully requests that the rejections with respect to Norman be withdrawn and the claims allowed.

§103 Rejection of the Claims

Claims 38, 42 and 43 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Norman (U.S. Patent No. 5,873,112) in view of Goldstein (U.S. Publication No. 2003/0028672). Claims 38 and 42-43 are dependent from amended independent claim 33; therefore, for the amendments and remarks presented above with respect to independent claim 33, the rejections of claims 38 and 42-43 should be withdrawn and these claims allowed. Applicant respectfully requests an indication of the same.

**CONCLUSION**

Applicant respectfully submits that the claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney at (513) 942-0224 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

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06/20/06

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